



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

July 6, 2022

VIA ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York

Re: SEC v. Ripple Labs, Inc. et al., No. 20-cv-10832 (AT) (SN) (S.D.N.Y.)

Dear Judge Torres:

Pursuant to the Court's Order of April 28, 2022 ("the Order") (D.E. 472), Plaintiff Securities and Exchange Commission ("SEC") respectfully seeks leave to file one omnibus motion to exclude or limit expert testimony, and that is up to 120 pages in length. Defendants do not object to this motion provided that they be allowed the same page limit for their response in opposition to the motion. The SEC does not object to Defendants' request.

The SEC intends to file motions to exclude or limit the testimony of *10 experts* who were retained by Defendant, Ripple Labs, Inc., and/or Individual Defendants, Christian A. Larsen and Bradley Garlinghouse. Those experts issued reports, including initial and/or rebuttal reports regarding numerous subject matters concerning this case, and which total over 500 pages, excluding exhibits. To conserve judicial and SEC resources, the SEC proposes to file one omnibus motion which combines what would otherwise be 10 separate motions against Defendants' experts into one single brief. The proposed 120-page limit is less than the total number of combined pages under the Order's 15-page limit per expert and is sufficient to adequately inform the Court of the applicable facts and law in support of the SEC's positions.

For these reasons, the SEC respectfully requests that the Court grant this motion. The SEC has submitted as Exhibit A hereto a Proposed Order reflecting this request.

Respectfully submitted,

/s/ Pascale Guerrier
Pascale Guerrier

cc: All counsel (via email)